

*In re: '318 Patent Infringement Litigation,
C.A. No. 05-356 (KAJ) (consolidated) (D. Del.)*

EXHIBIT 4

to Defendants' 12-16-05 Letter:

Chart summarizing relevant dates in current
Scheduling Order and proposed revised dates

Summary of Parties' Revised Scheduling Order Proposals¹

	Current Deadline (See 10/21/2004 Scheduling Order, D.I. 30)	Defendants' Proposal	Plaintiffs' Proposal
Joinder of Parties/ Pleading Amendments (Section 2)	• Six (6) months before close of fact discovery	• Two (2) months before close of fact discovery	• Six (6) months before close of fact discovery
Cut Off for All Discovery (Section 4(d))	• 2/16/2007	• 7/28/2006	• 12/22/2006
Fact Discovery Cut Off (Section 4(d))	• 8/30/2006	• 4/14/2006	• 8/1/2006
Cut Off for Commencing Expert Discovery (Section 4(d))	• 10/4/2006	• 5/10/2006	• 8/8/2006
Expert Discovery Cut Off (Section 4(d))	• 2/16/2007	• 7/28/2006	• 12/22/2006
Expert Disclosures (Section 4(e))	<ul style="list-style-type: none"> • Opening report 135 days before completion of all discovery (<i>i.e.</i>, on or before 10/4/2006) • Response reports 74 days before completion of all discovery (<i>i.e.</i>, on or before 12/4/2006) • Reply reports 45 days before completion of all discovery (<i>i.e.</i>, on or before 1/2/2007) 	<ul style="list-style-type: none"> • Opening reports on or before 5/10/2006 • Response reports on or before 5/31/2006 • Reply reports on or before 6/21/2006 	<ul style="list-style-type: none"> • Opening reports on or before 8/8/2006 • Response reports on or before 10/9/2006 • Reply reports on or before 11/9/2006
Interim Status Reports (Section 8)	<ul style="list-style-type: none"> • 3/7/2006 • 12/6/2006 	<ul style="list-style-type: none"> • 1/6/2006 • 5/2/2006 	<ul style="list-style-type: none"> • 1/27/2006 • 10/27/2006
Status Conferences (Section 9)	<ul style="list-style-type: none"> • 3/14/2006 • 12/13/2006 	<ul style="list-style-type: none"> • 1/17/2006 • 5/9/2006 	<ul style="list-style-type: none"> • 2/3/2006 • 11/3/2006
Tutorial (Section 10)	• 8/1/2006 (either in person or by videotape)	• 3/21/2006 (either in person or by videotape)	• 6/1/2006 (either in person or by videotape)

¹ This summary addresses only those sections of the original Scheduling Order entered by the Court on October 21, 2005, in which the parties propose to modify dates.

	Current Deadline (See 10/21/2004 Scheduling Order, D.I. 30)	Defendants' Proposal	Plaintiffs' Proposal
Dispositive Motions (Section 11)	<ul style="list-style-type: none"> • Opening briefs on or before 3/16/2007 • Answering briefs on or before 4/13/2007 • Reply briefs on or before 5/1/2007 	<ul style="list-style-type: none"> • Opening briefs on or before 8/18/2006 • Answering briefs on or before 9/8/2006 • Reply briefs on or before 9/22/2006 	<ul style="list-style-type: none"> • Opening briefs on or before 1/30/2007 • Answering briefs on or before 2/27/2007 • Reply briefs on or before 3/20/2007
Claim Construction Briefs (Section 13)	<ul style="list-style-type: none"> • 3/16/2007 	<ul style="list-style-type: none"> • 8/18/2006 	<ul style="list-style-type: none"> • 1/30/2007
Hearing on Dispositive Motions/Markman Hearing (Section 14)	<ul style="list-style-type: none"> • 5/7/2007 	<ul style="list-style-type: none"> • 9/28/2006 	<ul style="list-style-type: none"> • 3/27/2007
Pre-Trial Conference and Order (Section 16)	<ul style="list-style-type: none"> • 9/7/2007, with Final Pretrial Order by 8/7/2007 	<ul style="list-style-type: none"> • 1/22/2007, with Final Pretrial Order by 12/21/2006 	<ul style="list-style-type: none"> • 7/27/2007, with Final Pretrial Order by 6/27/2007
Trial (Section 19)	<ul style="list-style-type: none"> • 10/9/2007 	<ul style="list-style-type: none"> • 2/19/2007 	<ul style="list-style-type: none"> • 8/27/2007